

Congress of the United States
Washington, DC 20515

October 31, 2006

Hon. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: SouthernLINC Communication Services, Inc. d/b/a SouthernLINC Wireless,
ETC Designation Petition, CC Docket No. 96-45, – Alabama, Florida and
Georgia**

Dear Ms. Dortch:

Consumers in areas that are expensive to serve, including rural areas, deserve the same access to affordable telecommunications services available to all other consumers. These consumers, like most, rely on the utility and convenience of mobile telecommunications services for voice communications, email and internet access, and emergency services. Increasingly, consumers expect their wireless phones to work everywhere, including in geographic areas prohibitively expensive to provide service. In recognition of this goal, Congress established a competitive universal service system managed by the FCC that allows eligible telecommunications carriers ("ETCs") to receive support for providing service in rural areas.

To that end, SouthernLINC Wireless filed Petitions with the FCC seeking ETC status in the states of Alabama, Florida and Georgia on September 14, 2004. Subsequently, SouthernLINC Wireless amended its Petitions to seek ETC status only in those areas where it provides coverage across the entire area. These Petitions have been pending for more than two years, and the delay is preventing consumers in these states from receiving the full benefits that the universal service system is designed to provide.

We strongly urge the FCC to immediately take action on the Petitions. In addition, we support the FCC granting SouthernLINC Wireless' ETC status for the following reasons:

- (1) The value of universal service as a national goal will be preserved and enhanced by making funding available for wireless services that consumers increasingly rely on for their telecommunications needs.
- (2) Rural communities and consumers, in particular, will benefit by having access to wireless services throughout the designated service areas.
- (3) SouthernLINC Wireless has a strong commitment to rural America, but it will not be able to implement its universal service plans to the benefit of rural communities and consumers without designation as an ETC.

- (4) SouthernLINC Wireless serves a crucial role during disasters, and the company has made providing reliable communications during a disaster a high priority.

This last point deserves further expansion. Fifteen named hurricanes have made landfall in its service territory since SouthernLINC Wireless began operations, the most recent being Hurricane Katrina, which caused extensive damage along the Mississippi and Alabama Gulf Coasts. In many instances, the SouthernLINC Wireless network provided the only immediate means of communicating along these areas of Mississippi and Alabama. SouthernLINC Wireless also took extraordinary steps to repair damaged facilities quickly and ensure that vital communications were possible. Its efforts included, among other things, deploying microwave facilities and mobile cell sites to replace damaged facilities, and activating approximately 2,500 phones for use by government and public safety entities including the Mississippi EMA, the National Guard, the U.S. Coast Guard and the Singing River Hospital. Similarly, when calls placed to the 228 area code in Mississippi could not be completed due to heavy call volume, SouthernLINC Wireless quickly provisioned public safety personnel with toll free numbers for their SouthernLINC Wireless phones in order to bypass overloaded equipment. Additionally, SouthernLINC Wireless enabled communication for public safety personnel regardless of whether they were SouthernLINC Wireless customers.

In order to continue providing high quality wireless services to underserved rural areas and to ensure emergency communications throughout disaster recovery, SouthernLINC Wireless must continue to make significant investments in its network. Promptly granting the applications of SouthernLINC Wireless for designation as an ETC in Alabama, Florida and Georgia would further the Commission's goals by facilitating the necessary investments. In those applications, SouthernLINC Wireless demonstrated not only its qualifications to be an ETC, but also its commitment to providing service to both rural communities and disaster areas. Therefore, we urge the Commission to expedite approval of the ETC applications of SouthernLINC Wireless, which have been pending for more than two years.

As required by Section 1.1206(b), this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding, and a copy is being e-mailed to Chairman Kevin Martin and Thomas Navin. Please direct any questions regarding this matter to the undersigned.

Thank you for your consideration.

Sincerely,

Charlie Nomad

Miley Logan - AL

Nathan Deal

Dani Scott

To Bonner

cc: Thomas Navin

